

ERIC HINES  
#663508/146993B  
SOUTH WOODS STATE PRISON  
215 BURLINGTON ROAD SO.  
BRIDGETON, N.J. 08302

RECEIVED  
MAR 23 2020

AT 8:30  
WILLIAM T. WALSH  
CLERK

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

ERIC HINES,  
Plaintiff,  
v.

HON. NOEL L. HILLMAN, U.S.D.J.,

CIVIL ACTION NO. 1:17-CV-02864-NLH-JS

GARY M. LANICAN ET. ALS  
Defendants,

NOTICE OF MOTION FOR PRELIMINARY  
INJUNCTION.

TO: MARVIN L. FREEMAN, ESQ  
DEPUTY ATTORNEY GENERAL

PLEASE TAKE NOTICE, THAT THE UNDERSIGNED, PLAINTIFF, HEREBY MOVES BEFORE THE HONORABLE NOEL L. HILLMAN, U.S. DISTRICT COURT JUDGE, SITING AT THE U.S. COURT HOUSE, P.O. BOX 2797, CAMDEN, NEW JERSEY 08101. FOR ORDER GRANTING MOTION FOR PRELIMINARY INJUNCTION. FOR APPROPRIATE COURSE OF MEDICAL SUPPLIES, PROPER DISPOSABLE OF HAZARDOUS WASTE, REQUEST PLAINTIFF BE TRANSFERRED TO ANOTHER CORRECTIONAL FACILITY DSO THREATS OF BODILY HARM BY SPECIAL INVESTIGATION DIVISION OFFICERS, ASSAULTS, AND USE OF FORCE BY STAFF ON DISABLE ADA CAUSING INJURY. PLAINTIFF FEARS FOR HIS LIFE AT SOUTH WOODS STATE PRISON. PLAINTIFF WILL RELY ON ORDER TO SHOW CAUSE, MOTION FOR A PRELIMINARY INJUNCTION, DECLARATION IN SUPPORT OF PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION. AND OTHER ACCOMPANYING DOCUMENTS WHICH WAS FILED WITH THE COURT CLERK.

NO TRIAL DATE HAS BEEN SET FOR THIS CASE.

DATE: MARCH 10, 2020

Eric Hines  
ERIC HINES PRO SE

ERIC HINES  
#663508/146993B  
SOUTH WOODS STATE PRISON  
215 BURLINGTON ROAD So.  
BRIDGETON, N.J. 08302

UNITED STATES DISTRICT COURT  
THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

ERIC HINES,  
Plaintiff,  
v.

GARY M. LANIGAN, ET. AL,  
Defendants,

HON. NOEL L. HILLMAN, U.S.D.J.,

CIVIL ACTION No. 1:17-cv-02864-NLH-JS

ORDER TO SHOW CAUSE AND PRELIMINARY INJUNCTION ORDER

UPON THE SUPPORTING DECLARATION OF THE PLAINTIFF AND THE ACCOMPANYING MEMORANDUM OF LAW IS

ORDERED THAT DEFENDANTS JOHN POWELL AND SHERITA LATIMORE-COLLIER SHOW CAUSE IN ROOM OF THE UNITED STATES COURT HOUSE, P.O. BOX 2797 CAMDEN, NEW JERSEY 08101, ON THE 27 DAY OF MARCH, 2020, AT 9:00 AM O'CLOCK, WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE PURSUANT TO RULE 65 (A), FED. R. CIV. P., ENJOINING THE SAID DEFENDANTS, THEIR SUCCESSORS IN OFFICE AGENTS, AND EMPLOYEES AND ALL OTHERS PERSONS ACTING IN CONCERN AND PARTICIPATION WITH THEM, TO PROVIDE WHEELCHAIR BOUND INMATE A MEDICALLY APPROPRIATE COURSE OF MEDICAL SUPPLIES, PROPER DISPOSABLE OF OF HAZARDOUS WASTE, MEDICAL SUPPLIES TO THE PLAINTIFF DESIGNED TO RESTORE AND MAINTAIN SEVERE ITCHING, RASH, PENIS BURNING, MEDICAL SITUATION WITH POSSIBLE SKIN BREAK DOWN. REQUESTING PLAINTIFF BE TRANSFERRED TO ANOTHER CORRECTIONAL FACILITY DO TO THREATS OF BODILY HARM BY SPECIAL INVESTIGATION DIVISION OFFICERS, ASSAULTS, AND USE OF FORCE BY STAFF WITH INJURY.

IT IS FURTHER ORDERED, THAT EFFECTIVE IMMEDIATELY,  
AND

PENDING THE HEARING AND DETERMINATION OF THIS MATTER, DEFENDANTS, JOHN POWELL AND SHERITA LATIMORE-COLLIER SHALL ARRANGE FOR THE PLAINTIFF TO BE EXAMINED BY A QUALIFIED MEDICAL DOCTOR AND TO MEDICAL DOCTOR AN EVALUATION OF THE CONDITION OF OF PLAINTIFF'S A PRESCRIPTION FOR A COURSE OF APPROPRIATE MEDICAL SUPPLIES THAT WILL RESTORE AND MAINTAIN THE SEVERE ITCHING, RASH, PENIS BURNING, MEDICAL SITUATION WITH POSSIBLE SKIN BREAK DOWN.

IT IS FURTHER ORDERED THAT THIS ORDER TO SHOW CAUSE, AND ALL OTHER PAPERS ATTACHED TO THIS APPLICATION, SHALL BE SERVED ON DEFENDANTS JOHN POWELL AND SHERITA LATIMORE-COLLIER, 2020, AND THE UNITED STATES MARSHALLS SERVICE IS HEREBY DIRECTED TO EFFECTUATE SUCH SERVICE.

---

UNITED STATES DISTRICT JUDGE

DATED: \_\_\_\_\_

ERIC HINES  
#663508/146993B  
SOUTH WOODS STATE PRISON  
215 BURLINGTON ROAD SO  
BRIDGETON, N.J. 08302

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

ERIC HINES,  
PLAINTIFF,

v.

GARY M. LANIGAN, ET. ALS  
DEFENDANTS,

HON. NOEL L. HILLMAN, U.S.D.J.,

CIVIL ACTION NO. 1:17-CV-02864-NLH-JS

DECLARATION IN SUPPORT OF PLAINTIFF'S MOTION FOR A  
PRELIMINARY INJUNCTION.

ERIC HINES STATES:

1). I AM THE PLAINTIFF IN THIS CASE. I MAKE THIS DECLARATION IN SUPPORT OF MY MOTION FOR A PRELIMINARY INJUNCTION TO ENSURE THAT, TO PROVIDE WHEELCHAIR BOUND INMATE A MEDICALLY APPROPRIATE COURSE OF MEDICAL SUPPLIES, PROPER DISPOSABLE OF HAZARDOUS WASTE. MEDICAL SUPPLIES TO THE PLAINTIFF DESIGNED TO RESTORE AND MAINTAIN SEVERE ITCHING, RASH, PENIS BURNING, MEDICAL SITUATION WITH POSSIBLE SKIN BREAK DOWN, AND DENIAL OF OTHER MEDICAL CARE SPELLED OUT IN AMENDED COMPLAINT.

2). PLAINTIFF COMPLAINT ALLEGES, INTER ALIA, VIOLATION OF THE CRUEL AND UNUSUAL PUNISHMENT CLAUSE OF THE EIGHTH AMENDMENT AND TITLE II OF THE ADA. (AM. COMPL. PP 3-4, 6-11).

3). PLAINTIFF WAS TRANSFERRED FROM ST. FRANCIS HOSPITAL ON JULY 30, 2015 TO SOUTH WOODS STATE PRISON EXTENDED CARE UNIT. AUGUST 3, 2015, WAS MOVED TO FACILITY #2 AT SOUTH WOODS STATE HOUSING UNIT 4-1RIGHT. AT ALL TIMES MENTIONED UPON ARRIVAL TO SWSP PLAINTIFF WAS RECEIVING THE FOLLOWING REQUIRED CERTAIN BASIC MEDICAL SUPPLIES A DAY (NINE ADULT DIAPERS, 5-12" CATHETERS, EIGHTEEN DISPOSABLE UNDERPADS (AKA "CHUX") ~~WET~~ DISPOSABLE LATEX GLOVES, TRASH BAGS TO DISPOSE OF USED DIAPERS AND GLOVES, AND FORTY-TWO SANITARY WET WIPERS.

IN THIS CASE, PLAINTIFF IS A PARAPLEGIC WHO MUST UTILIZE SELF CATHETERS AND REQUIRES CERTAIN BASIC SUPPLIES TO DISIMPACT HIS BOWELS ON A REGULAR BASIS. POINT #3 DETAILS MEDICAL SUPPLIES PLAINTIFF WAS RECEIVING DAILY.

4). ON OR ABOUT MARCH 21, 2016, DEFENDANTS JANE DOE #1 NURSE AND OFFICER E. MARIN, WERE BOTH INFORMED THAT PLAINTIFF DIAPER WAS FULL OF FECES AND WAS IN DIRE NEED OF CHANGING. THIS REQUEST WAS DENIED FORCING PLAINTIFF TO PULL MATTRESS OFF THE BED TO FLOOR, TO EAT AND RECEIVE MEDICATION. PLAINTIFF WAS DEPRIVED OF DIAPERS, FORCE TO SLEEP IN SOILED DIAPER. (AM. COMPL. PP. 2-5 DATED 12/23/19). PLAINTIFF REPEATS THE ALLEGATIONS OF THE ENTIRE PARAGRAPHS OF THE REFERENCE # 224697, GRIEVANCES AS IF SET FORTH HEREIN AT LENGTH AND MAKES THEM A PART HEREOF. (UNDER EXHIBIT-A).

5). SCO. WATERS HAS NUMEROUS OCCASIONS VIOLATED MY CONSTITUTIONAL RIGHTS OF AMERICANS WITH DISABILITIES ACT (ADA), DENIAL PLAINTIFF TO GET MY MEDICAL SUPPLIES. PLAINTIFF REPEATS THE ALLEGATIONS OF THE ENTIRE PARAGRAPHS OF THE REF # 242073, INQUIRY AS IF SET FORTH HEREIN AT LENGTH AND MAKES THEM A PART HEREOF. (UNDER EXHIBIT-B).

6). NURSE PRACTITIONER JENNIFER, ON OR ABOUT OCTOBER 28, 2016 FOR THE SECOND TIME THAT WEEK 3 DIAPER A DAY AND 1 CATHETER WAS CRUEL AND UNUSUAL PUNISHMENT. AND THAT MOST DAYS PLAINTIFF IS LEFT WITH FECES IN HIS DIAPER BY 4:00 P.M. HER REFUSAL TO SUPPLIES ME WITH GLOVES TO SELF CATH WAS CAUSING PENIS BURNING. LIZ TORRES OR LINDA LINEN ADA COORDINATOR ANSWER GRIEVANCE BUT FAIL TO ACT.

PLAINTIFF REPEATS THE ALLEGATIONS OF THE ENTIRE PARAGRAPHS OF THE REF # 250380, GRIEVANCE AS IF SET FORTH HEREIN AT LENGTH AND MAKES THEM A PART HEREOF. (UNDER EXHIBIT-C).

7). ON OCTOBER 9, 2017, JENNIFER FARESTAD, MEDICAL DIRECTOR DR. LATIMORE-COLLIER CONTINUED TO SIGN ON FARESTAD CRUEL AND UNUSUAL PUNISHMENT. AND SHE AND MS. COLLIER, HAD ACKNOWLEDGEMENT THAT PLAINTIFF WAS BEING REFUSED GLOVES + WIPES HAVING TO SELF CATHETERIZE FOR A HOLD YEAR AT THE TIME. OMBUDSMAN ANTHONY

HAD PERSONAL KNOWLEDGE BUT FAIL TO ACT. (AM. COMPL. PP 9-11)  
 PLAINTIFF REPEATS ALLEGATIONS OF THE ENTIRE PARAGRAPHS OF THE  
 REF# 649457, INQUIRY AS IF SET FORTH HEREIN AT LENGTH AND MAKES  
 THEM A PART HEREOF. (UNDER EXHIBIT-D).

8). ON DECEMBER 13, 2017, (ADA) INQUIRY REQUEST MEDICAL DIRECTOR  
 DR. LATIMORE-COLLIER, FAIL TO PROPERLY SUPERVISE, N/P JENNIFER FARESTAD  
 ALLOWING HER TO DENY ME MEDICAL SUPPLIES TO DEAL WITH DIAPERS +  
 SELF CATHETERS, GLOVES + DRY WIPES TO PROPER CLEAN MY SELF VIOLATES  
 (ADA). SEE REF# 713049, ON JUNE 6, 2018, RE: MEDICAL SUPPLIES AFFORDED  
 TO (ADA) INMATES IN POPULATION, DISCRIMINATION AND DEPRIVATION TOWARDS  
 (ADA) INMATE IN (ACSU) ADMINISTRATIVE CLOSE SEGREGATION UNIT. CLEARLY,  
 CONFIRMS LUZ TORRES, LINDA UNEN, (ADA) COORDINATORS, R.B.H.C. DR. LATIMORE-  
 COLLIER, FARESTAD WERE PUT ON NOTICE ABOUT "MAINTAIN HYGIENIC, AND TO  
 PREVENT INFECTION LEADING TO FUTURE MEDICAL COMPLICATION. WHICH 3-DIAPER,  
 1-CATHETER STILL BEING SUPPLIED A DAY, MS. FARESTAD INFORMED SHE CATH'S  
 WITHOUT GLOVES, SO I CANTO, WIPES WERE NOT NEEDED, USE YOUR WASH  
 CLOTH TO CLEAN FECE. WHICH AT THAT POINT HAS CAUSED ITCHING, RASH,  
 PENIS BURNING. (AM. COMPL. PP 9-11 DATE 12/23/19). PLEASE TAKE NOTICE  
 TO OMBUDSMAN ANTHONY THOMAS OF MEDICAL AND S.W.S.P. ADMINISTRATOR  
 WILLIE BONDS ON REF# SWSP-18014350, GRIEVANCES. PLAINTIFF REPEATS  
 ALLEGATIONS OF THE ENTIRE PARAGRAPHS OF THE REF# 713049, GRIEVANCES  
 (UNDER EXHIBIT-E) AND REF# SWSP-18014350, GRIEVANCE AS IF SET FORTH  
 HERE AT LENGTH AND MAKES THEM A PART HEREOF. (UNDER EXHIBIT-F).

9). ON JUNE 10, 2018, REF# SWSP-18014882, GRIEVANCES, CONFIRMS  
 FARESTAD IS STILL DENYING PLAINTIFF PROPER MEDICAL SUPPLIES, ADA CELL,  
 ACCESS TO SHOW CHAIR, DIETATION AND WITHHOLDING MEDICATION AS A FORM  
 PUNISHMENT, NO MATTER THE MEDICAL INJURY. (AM. COMPL. PP-9-11), EX-G

10). ON OCTOBER 15, 2018, PLAINTIFF HAD ALSO BEEN COMPLAINING OF  
 NO TRASH BAGS, TO DISPOSE OF WASTE, SO NURSE ANGIE STATE THAT N/P  
 FARESTAD, ORDERED HER TO INFORM ME TO PLACE USE CATHETERS AND  
 DIAPERS IN THE CORNER. WHEN INMATES SUPPLIES IS DEPLETED, USED ONES  
 MUST BE RETURNED TO NURSE BEFORE RECEIVING MORE. ON OCTOBER 16, 18  
 NURSE ANGIE REFUSE TO HANDLE HAZARDOUS WASTE IN CORNER OF CELL BUT

N/P FARESTAD AND NURSE ANGIE STILL HAS DENIED PLAINTIFF GLOVES, ONLY 3-DIAPER 1-CATHETER, NO WIPES, NO UNDERPADS (AKA CHUX) ARE STILL BEING REFUSED (AM. COMPL. PP 9-11). PLAINTIFF REPEAT ALLEGATIONS OF THE ENTIRE PARAGRAPHS OF UNDER EXHIBIT-H, IS REF#SWSP-18036210, EXHIBIT-I, IS REF#SWSP-18036402, AND EXHIBIT-J, IS REF#SWSP-18038004.

11). ON OR ABOUT MAY 1, 2019, EVERY MORNING, AT APPROX. 7:45 AM., PLAINTIFF NOW RECEIVES 2 UNDERPADS, 5 GLOVES, 5 DIAPERS, 5 SANITARY WIPES, AND 5 CATHETERS. THIS ISN'T SUFFICIENT TO FULFILL PLAINTIFF'S MEDICAL NEEDS. (AM. COMPL. PP 10).

12). ON SEPTEMBER 9, 2019, PLAINTIFF RECEIVE 3-CATHETERS, 4 GLOVES, 5 WIPES, 1-CHUX, AND NO DIAPER HAD TO WEAR DIAPER WITH PEES FROM SEPTEMBER 8, TO 9 OF 2019. (SEE EXHIBIT-K, REF#SWSP-19039083.

13). ON OCTOBER 21, 2016, HAND DELIVER SPECIAL INVESTIGATION DIVISION OFFICER PERRY, DETAILING PREA/ABUSE BY SGO. WATERS, READ-IT HE STARTED LAUGHED BOASTFULLY STATED SHE'LL BE MOVED FOR A FEW DAYS. BUT PREA/SEXUAL TOUCHING ARE YOU CRAZY. NOT SATISFACTORY I WANT CHARGES FILLED. THE ~~GOOD~~ RESULTS ARE DETAILED, THREATS OF BODILY HARM BY (S.I.D) OFFICERS. (AM. COMPL. PP 15 POINT #3). ALLEGATIONS OF THE ENTIRE PARAGRAPHS OF REF#SWSP-18000345, GRIEVANCES AS IF SET FORTH HEREIN AT LENGTH AND MAKES THEM A PART HEREOF. (UNDER EXHIBIT-L).

14). ON NOVEMBER 8, 2016, FACILITY #2 ~~OFFICER~~ OFFICER ORDERED PLAINTIFF TO PACK PERSONAL PROPERTY AND REPORT TO CENTER, TO SGT. VALLE AT WINDOW SHE STATED "STILL RATTING ON OFFICERS, NOT GOING TO LEARN UNTIL YOU GET YOUR ASS WHIPPED. (AM. COMPL PP 14-16). (REF# UNDER EXHIBIT-M).

15). ON NOVEMBER 16, 2016, DEMONSTRATE (S.I.D) PETIT THREATS OF BODILY HARM AND REFUSAL TO ADVANCE PLAINTIFF COMPLAINT. (AM. COMPL. PP 16). (REF#SWSP-18000835 UNDER EXHIBIT-N).

16). ON SEPTEMBER 25, 2018, PLAINTIFF BEGGED THE CENTRAL OFFICE TO INTERVENE. (REF#SWSP-18032627 UNDER EXHIBIT-O). AND (ON JANUARY 19, 2019, SECOND REQUEST REF#SWSP-19003028, UNDER EXHIBIT-P). (ON JANUARY 26, 2019, THIRD REQUEST REF#SWSP-19004002

# UNDER EXHIBIT-Q).

17). ON FEBRUARY 13, 2019, PLAINTIFF FILED ANOTHER COMPLAINT FIRST SHIFT, OFFICERS MARIN, FARDONE, BAGLIANI, HIGBEE, ACTION ARE THAT OF A GANG, RETALIATORY ACTS FOR ME FILING PREA COMPLAINT ON FELLOW OFFICER, WHILE PROPERTY OFFICER JACKSON MISUSE, DESTROY, OR DISCARD MY PROPERTY. JANUARY 30, 2019, OFFICER MORATELLI (AM. COMPL PP. 17) ON FACE SHEET WROTE DEROGATORY WORDS, VOCIE SAME RAT, SNITCH (AM. COMPL PP 18). L. SMITH ON FEBRUARY 9, 2019 GAVE KEYS TO C/O MORATELLI WHO CAME TO CELL 1028, STATED(SID) GOFFREDI AND C/O L. SMITH, STATED NIGGER YOUR FUCKING WITH OUR JOBS, WERE GOING TO HANG YOUR ASS. HOW CAN OFFICIALS QUESTION ME FEARING FOR MY LIFE. (AM. COMPL. PP 13-17). (REF# SWSP-19006814, REF# SWSP-19007102 IS A CONTINUED FROM REF# SWSP-19006814. DOCUMENTED UNDER EXHIBIT-R-1, R-2).

18). ON APRIL 27, 2019, AT APPROX. 7:30 P.M, INSIDE RECREATION WAS TERMINATED. DEFENDANT L. SMITH GRABBED PLAINTIFF IN A CHOKE HOLD, AND WHISPERED IN PLAINTIFF'S EAR "NIGGER YOU THINK I'M PLAY WITH Y. DO YOU SEE HOW EASILY I CAN BREAK YOUR FUCKING NECK? (AM. COMPL. PP 18). COPY OF GRIEVANCE IS BEING REFUSED. IT MIND BLOWING AT THE TIME PLAINTIFF LAWYER MR. CHARLES H. LANDESMAN WAS NOTIFIED AND FAIL TO ACT. PLAINTIFF WAS THEN ASSUAITED AGAIN, AND DOCUMENTATION WILL CONFIRM HE FAIL TO PROTECT HIS CLIENT. COURT WAS NOTIFIED.

19). DEFENDANT OFFICER MCNEAR ON SEPTEMBER 28, 2019, DEFENDANT MCNEAR WAS AN ESCORT OFFICER. PLAINTIFF EXITED HIS CELL, DEFENDANT MCNEAR GRABBED THE HANDLE BARS OF THE WHEELCHAIR, AND STATED "THIS IS WHAT WE DO TO RATS". DEFENDANT MCNEAR THEN SHOVED THE WHEELCHAIR ACROSS THE AREA, AND PLAINTIFF CRASHED INTO CELL 1023, INJURING HIS LEFT WRIST AND LEFT KNEE. PLAINTIFF WAS UNABLE TO STOP THE WHEELCHAIR, OR DO ANYTHING BECAUSE PLAINTIFF WAS HANDCUFFED. SGT. HORSEY WAS STANDING AT CELL 1021, AND WITNESSED THIS BARBARIC SCENE. (AM. COMPL. PP. 19-20).

20). AS PLAINTIFF HAS DEMONSTRATED ABOVE, WITHOUT THE SPECIAL INVESTIGATION DIVISION OFFICERS, REPORTS HOW CAN PLAINTIFF MAKE MAKE A VALUABLE DEFENSE, GET A EXPERT OR REPORTS FOR THAT MATTER

HOW DOES PLAINTIFF HONOR PRETRIAL FACTUAL DISCOVERY BY DEADLINE OF MAY 1, 2020.

21). DEFENDANT DR. LATIMORE-COLLIER IS RESPONSIBLE FOR PROVIDE MEDICAL SUPPLIES, PROPER MEDICAL CARE FOR WHICH SHE HAS FAILED. I AM SUFFERING IRREPARABLE HARM IN THE FORM OF SEVERE ITCHING, RASH, PENIS BURNING, MEDICAL SITUATION WITH POSSIBLE SKIN BREAK DOWN, AND WITH SEVERE PAIN IN RIGHT SHOULDER BLADE, BUT I FORCE TO WRITE IN PAIN TO PROTECT PLAINTIFF'S RIGHTS, BECAUSE OTHER HE WILL BE STRIPPED OF NOT ONLY HIS RIGHT BUT IRREPARABLE HARM TO SHOULDER.

22). DEFENDANT JOHN POWELL RECEIVE ALL INVESTIGATION REPORTS FROM SPECIAL INVESTIGATION DIVISION OFFICER AND HAS THE FINAL SAY, FOR WHICH HE HAS CHOSEN TO TURN A BLIND EYE. HIS REFUSAL TO TURN OVER SPECIAL INVESTIGATION DIVISION, DOCUMENTS VIOLATES PLAINTIFF CONSTITUTIONAL RIGHT TO REDRESS.

23) TOGETHER, THESE DEFENDANTS HAVE THE RESPONSIBILITY FOR PROVIDING THE PLAINTIFF WITH THE ~~NECESSARY~~ NECESSARY MEDICAL CARE AND MEDICAL SUPPLIES. AS WELL AS THE ABILITY TO ARRANGE IT.

24). FOR REASON SET FORTH IN THE MEMORANDUM OF LAW FILED WITH THIS MOTION, THE PLAINTIFF IS ENTITLED TO A PRELIMINARY INJUNCTION ORDER REQUIRING THE DEFENDANTS TO ARRANGE FOR APPROPRIATE COURSE OF MEDICAL SUPPLIES, PROPER DISPOSABLE OF HAZARDOUS WASTE, MEDICAL SUPPLIES TO RESTORE AND MAINTAIN SEVERE ITCHING, RASH, PENIS BURNING MEDICAL SITUATION OF POSSIBLE SKIN BREAK DOWN. AND FOR PLAINTIFF TO BE TRANSFERRED TO ANOTHER CORRECTIONAL FACILITY DOTO THREATS OF BODILY HARM BY (S.I.D) OFFICERS, ASSAULTS, USE OF FORCE BY STAFF WITH INJURY.

25). FOR THE FOREGOING REASONS, THE COURT SHOULD GRANT THE PLAINTIFF'S MOTION IN ALL RESPECTS.

PURSUANT TO 28 U.S.C. § 1746, I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

DATE: MARCH 10, 2020

ERIC HINES  
#663508/146993B  
SOUTH WOODS STATE PRISON  
215 BURLINGTON ROAD SO.  
BRIDGETON, N.J. 08302